

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF GREENWOOD	)	EIGHTH JUDICIAL CIRCUIT
	)	
CHRISTOPHER J. MCKEE,	)	
	)	SUMMONS
<b>Plaintiff,</b>	)	
	)	
v.	)	CASE NO.: 2025-CP-24- _____
	)	
DUKE ENERGY CAROLINAS, LLC,	)	JURY TRIAL DEMANDED
PIKE ELECTRIC, LLC, DONNIE	)	
FREEMAN, AND ROSA B. FREEMAN	)	
AND ROSE B. HARLING, A/K/A ROSA	)	
B. HARLING, N/K/A ROSA B.	)	
FREEMAN,	)	
<b>Defendant.</b>	)	

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**TO THE DEFENDANTS ABOVE NAMED:**

YOU ARE HEREBY SUMMONED and required to Answer the Complaint in the above entitled action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the same on the subscriber hereto, at his office, 307 Main Street, Post Office Box 3321, Greenwood, South Carolina 29648, within THIRTY (30) DAYS after the service thereof, exclusive of the date of such service, and if you fail to Answer the Complaint within the time aforesaid, the Plaintiff will apply to the Court for the relief demanded in said Complaint.

**TOMMY L. STANFORD & ASSOCIATES, PC**

Greenwood South Carolina

December 4, 2025.

*s/ Tommy L. Stanford*  
**TOMMY L. STANFORD**  
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<b>COUNTY OF GREENWOOD</b>	)	<b>EIGHTH JUDICIAL CIRCUIT</b>
	)	
<b>CHRISTOPHER J. MCKEE,</b>	)	
	)	<b>COMPLAINT</b>
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CASE NO.: 2025-CP-24- _____</b>
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<b>DUKE ENERGY CAROLINAS, LLC,</b>	)	<b>JURY TRIAL DEMANDED</b>
<b>PIKE ELECTRIC, LLC, DONNIE</b>	)	
<b>FREEMAN, AND ROSA B. FREEMAN</b>	)	
<b>AND ROSE B. HARLING, A/K/A ROSA</b>	)	
<b>B. HARLING, N/K/A ROSA B.</b>	)	
<b>FREEMAN,</b>	)	
<b>Defendant.</b>	)	

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The Plaintiff, complaining of the above-named Defendants, would respectfully show unto this Honorable Court the following:

1. The Plaintiff is a citizen and resident of the County of Greenwood, State of South Carolina.
2. The Defendant, Duke Energy Carolinas, LLC (“Duke Energy”), is a foreign limited liability company organized under the laws of the State of North Carolina, authorized to do business, and is engaged in substantial business, in the County of Greenwood, State of South Carolina is subject to the jurisdiction of this Court.
3. The Defendant, Pike Electric, LLC (“Pike”), is a foreign limited liability Company organized under the laws of North Carolina, authorized to do business, and is engaged in substantial business in the County of Greenwood, State of South Carolina, and is subject to the jurisdiction of this Court.
4. That, upon information and belief, Defendants, Donnie Freeman and Rosa B. Freeman, Rose B. Harling, A/K/A Rosa B. Harling, N/K/A Rosa B. Freeman (“Freemans”) are citizens and residents of the County of Greenwood, State of South Carolina.
5. The accident that gives rise to this litigation occurred in Greenwood County, South Carolina.
6. Venue and jurisdiction are proper in this Court.

**FACTUAL ALLEGATIONS**

7. The Plaintiff incorporates all previous paragraphs by reference as if fully set forth herein.
8. On or about October 31, 2022, the Plaintiff purchased approximately 1.34 acres of land, more or less from Rose B. Harling A/K/A Rosa B. Harling N/K/A Rosa B. Freeman, Tax Map No.: 6828-893-463.
9. The said 1.34 acres of land had two addresses, 117 Capers Lane, on which an old mobile home sat on and 136 Capers Lane, which served as the Plaintiff's primary residence.
10. Upon information and belief, prior to the purchase of the 1.34 acres of land by the Plaintiff, the old mobile home burned down and was cleared off the 1.34 acres of land.
11. At the time the Plaintiff purchased the 1.34 acres of land, the area in which the old mobile home sat upon was overgrown with grass and weeds to the extent that you could not see the riser pipe and electric wires inside of it coming out of the ground.
12. Upon information and belief, after the old mobile home burned down and the land was cleared, a riser pipe, electrical wires coming out of the riser pipe, and underground meter structure was left on the land, where the old mobile home had been situated and located.
13. Upon information and belief, Duke Energy provided electrical service to 136 Capers Lane and 117 Capers Lane in Hodges, South Carolina, as well as to all structures on the 1.34-acre property that required electricity.
14. Upon information and belief, on or before 2021, the old mobile home burned down, and the Defendants cut the riser cap and the electrical wiring contained within it.
15. The Defendants failed to disconnect or shut off the electricity running through the electrical wires in the riser pipe after the old mobile home was removed, despite having professionally cut the riser cap and electrical wiring.
16. The Plaintiff, while working in the yard, cutting grass, and removing debris from the property, was electrocuted by electricity coming from the wires in the riser cup.

17. The electrical shock sustained by the Plaintiff caused severe bodily injuries and significant mental anguish.

18. As a direct and proximate result of the aforementioned acts of negligence, gross negligence, recklessness, carelessness, willfulness, and/or wantonness on the part of all of the Defendants The Plaintiff has sustained personal injuries, including but not limited to bodily injuries, past and future pain and suffering, mental anguish, and distress, and medical expenses, all in an amount to be determined at trial.

19. The Plaintiff alleges that the Defendants are jointly and severally liable for their respective negligence, gross negligence, recklessness, and other liability forming conduct that caused injury and harm to the Plaintiff.

20. Upon information and belief, the Plaintiff is entitled to recover from all of the Defendants actual and punitive damages.

**FOR A FIRST CAUSE OF ACTION**  
**(Negligence, Negligence Per Se, Gross Negligence, and Recklessness As To Duke Energy)**

21. The Plaintiff reiterates the allegations contained in paragraphs 1-20 as if fully repeated herein.

22. Duke Energy provides electrical service to the old mobile home located on the 1.34-acre property at 117 Capers Lane, Hodges, South Carolina, as well as to the property at 136 Capers Lane, Hodges, South Carolina, which is also 1.34 acres and owned by the Plaintiff.

23. The provision of electricity by Duke Energy is inherently hazardous and poses a risk of serious bodily injury or death.

24. The riser cup and the electrical wires extending from it, originating from underground and carrying “live” electricity supplied by Duke Energy, caused the injuries sustained by the Plaintiff.

25. The electrical shock to the person of the Plaintiff, resulting in injuries were the direct and proximate result of Duke Energy’s negligence, gross negligence, willful, wanton, reckless, and careless conduct in one or more of the following particulars, to wit:

- a. Failure to remove the riser pipe from under the ground and leaving the riser pipe exposed;

- b. Failure to remove electrical wires from under the ground and leaving the electrical wires exposed;
- c. Allowing the electricity coming from the electrical wires to remain open and active;
- d. Creating hazardous and dangerous conditions by leaving the electricity on and exposed;
- e. In failing to inspect the riser pipe, which contained the electrical wire with the live electricity flowing through it;
- f. Failure to place warning signs to notify the Plaintiff or any other person on the land of the open and existence of “live” electricity coming from the electrical wires in the riser cup and danger of “live” electricity;
- g. Failure to use the proper degree of care to prevent injuries to the Plaintiff;

26. As a direct and proximate result of the foregoing acts of negligence, gross negligence, and reckless, willful, and wanton conduct by Duke Energy, the Plaintiff is entitled to recover damages for pain and suffering, mental anguish, loss of enjoyment of life, temporary and permanent disability, and other losses, in an amount to be determined by a jury in this action.

**FOR A SECOND CAUSE OF ACTION**

**(Negligence, Negligence Perse, Gross Negligence, and Recklessness As To Pike Electric, LLC)**

27. The Plaintiff reiterates the allegations contained in paragraphs 1-26 as if fully repeated herein.

28. Upon information and belief, Pike acted as an agent and/or contractor for Duke Energy. Pike provided contractor services to the old mobile home located on the 1.34-acre property at 117 Capers Lane, Hodges, South Carolina, as well as to the property at 136 Capers Lane, Hodges, South Carolina, which is also 1.34 acres and owned by the Plaintiff.

29. The provision of electrical services by Pike Electric is inherently hazardous and poses a risk of serious bodily injury or death.

30. The riser cup and the electrical wires extending from it, originating from underground and carrying “live” electricity supplied by Duke Energy, caused the Plaintiff’s injuries. Pike had knowledge that the electricity in the riser cup was “live.”

31. The electrical shock to the person of the Plaintiff, resulting in injuries were the direct and proximate result of Pike's negligence, grossly negligence, willful, wanton, reckless, and careless conduct in one or more of the following particulars, to wit:

- a. Failure to remove the riser pipe from under the ground and leaving the riser pipe exposed;
- b. Failure to remove electrical wires from under the ground and leaving the electrical wires exposed;
- c. Allowing the electricity coming from the electrical wires to remain open and active;
- d. Creating a hazardous and dangerous condition by leaving the electricity on and exposed;
- e. In failing to inspect the riser pipe, which contained the electrical wire with live electricity flowing through it;
- f. Failure to place warning signs to notify the Plaintiff or any other person on the land of the open and existence of "live" electricity coming from the electrical wires in the riser cup and danger of "live" electricity;
- g. Failure to use the proper degree of care to prevent injuries to the Plaintiff;

32. As a direct and proximate result of the foregoing acts of negligence, gross negligence, and reckless, willful, and wanton conduct, the Plaintiff is entitled to recover damages to compensate for pain and suffering, mental anguish, loss of enjoyment of life, temporary and permanent disability, and other losses, in an amount to be determined by a jury.

**FOR A SECOND CAUSE OF ACTION**

**(Negligence, Negligence Per Se, Gross Negligence, and Recklessness As To Donnie Freeman and Rosa Freeman)**

33. The Plaintiff reiterates the allegations contained in paragraphs 1-32 as if fully repeated herein.

34. Upon information and belief, Donnie Freeman and Rosa Freeman are husband and wife and were the owners of the property situated and located at 117 Capers Lane in which the mobile home was upon and 136 Capers Lane. Freeman sold the 1.34 acres of land.

35. At the time the old mobile home burned down, Freeman were the owners of the old mobile home and the 1.34 acres of land.

36. Upon information and belief, Freeman had knowledge that the electricity coming out of the electrical wires in the riser cup was not turned off. The Plaintiff was severely injured by the electricity.

37. The electrical shock to the person of the Plaintiff resulting in injuries were the direct and proximate results of Freeman's negligence, gross negligence, willful, reckless, and careless conduct in one or more of the following particulars, to wit:

- a. Failure to use the proper degree of care to prevent injuries to the Plaintiff;
- b. In failing to notify the Plaintiff that the electrical wiring in the riser cup was "live" and could electrically shock him and cause injury;
- c. Failure to confirm with Defendants Duke Energy and Pike that the electricity was not on;
- d. In allowing a danger, ultra hazardous and dangerous condition to remain on the 1.34 acre of land;
- e. Failure to have the wires under the ground, and the riser cup and all electrical equipment removed from the 1.34 acres of land;
- f. Knowing that the riser cup and electrical wires were not properly removed;

38. As a direct and proximate result of Freeman's negligence, gross negligence, reckless, willful, wanton conduct, the Plaintiff is entitled to recover a sum to compensate him for his pain and suffering, mental anguish, loss of enjoyment of life, temporary and permanent disability and other damages in an amount to be determined by a jury.

39. Upon information and belief, Duke Energy, Pike, and Freemans are jointly and severally liable for their respective negligence, gross negligence, recklessness, and other liability forming the conduct that caused injury and harm to the Plaintiff for an amount to be determined by a jury.

**WHEREFORE**, the Plaintiff prays for judgment against Duke Energy, Pike, LLC, Donnie Freeman, and Rosa B. Freeman, jointly and severally, for actual damages, special damages, consequential damages, and punitive

damages in an amount to be determined by a jury, and for such other and further relief as the Court deems just and proper

**Respectfully Submitted,**

**TOMMY L. STANFORD & ASSOCIATES, PC**

Greenwood South Carolina

December 4, 2025.

*s/ Tommy L. Stanford*

**TOMMY L. STANFORD**

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